

## Message

**From:** Kay, Robert [rtkay@usgs.gov]  
**Sent:** 3/27/2014 5:54:27 PM  
**To:** Nordine, John [nordine.john@epa.gov]  
**Subject:** re-re-re-submittal of Oct. Monthly Progress report, Techalloy site

John--this is a response to the materials sent (near as I can tell) from you to me in an e-mail on March 27, 2014. It includes attachments sent via e-mail from Jack Thorsen to you, with cc's to me on March 25, 2014 at 2:40 PM and a lab report sent from Jack to you at 2:49 PM on the 25th, which you forwarded to me as part of your e-mail on the 27th. I'm getting a lot of versions of this monthly report from different sources, so I'm having trouble keeping track of who sent what when.

The main (only) addition to this version of the report is the inclusion of the lab report for the treatment system effluent sampling. This e-mail constitutes my review of the information presented in you March 27th e-mail.

1. This submission includes all of the information we have asked for--progress report, DMR form, water level data, precip data, lab sheets. Comments made on previous re-submitted versions of the report pertaining to the plotting of the water level and precipitation and pumping data have been adequately addressed. A couple of issues have become evident with the submission of the lab reports.
2. The lab report giving the results of the effluent sampling has 1,1,1-TCA at a concentration of <0.20 ug/L (non-detect). The 10-31-13 DMR form reports 1,1,1-TCA as =0.0002 mg/L, which means it is reported as having been detected at a concentration of 0.20 ug/L. For the sake of accuracy the 1,1,1-TCA value on the DMR form should be changed to <0.0002 mg/L. If there are problems with making this change Autumwood needs to explain the problem, and what steps are being taken to correct it.
3. I still think the discussion of the effluent sampling in the Monthly Progress Report should include explicit mention of the issues with the incorrect analytes reported on the form. As currently presented, Autumwood and Techalloy are submitting a document that they know includes false information. They know this information is false because we pointed the falsity out to them in our prior review comments and asked them to correct the report. For the sake of accuracy, let alone avoiding legal complications, this progress report, and all appropriate subsequent reports, should mention the errors in the DMR report, the cause of the errors, and the steps being taken to correct the errors. Again, Autumwood has already provided an adequate explanation of the issues in the Jan. 2014 monthly progress report, so 90 percent of dealing with this issue is cut and paste the appropriate text.
4. The document should note the lab sheets for the effluent sampling are included in an attachment to the report.
5. Per Jack's comment in the e-mail sent to you on March 25, 2014 about receiving "this report every month", I believe we have made it clear that we want to see the lab reports for every sample collected as part of the RCRA mandated monitoring--influent, effluent, groundwater, whatever. I believe we also made it clear we wanted the lab sheets included as part of the submittals for the appropriate monthly progress report, and that there be an appropriate level of discussion of the sampling and sample results in the monthly report.

Is sampling from the North and South Ponds required by RCRA? If not, this data can be omitted from the Monthly report. If required by RCRA, the sampling and the sampling results should be discussed in this report.

6. The Chain of Custody Record form presented in the lab report seems to have some issues. First, all of the samples appear to have been collected at the exact same time (down to the minute). This document appears to be presenting false information. Future COC records should be filled out with the correct times.

Second, the form gives no indication of who relinquished the samples at the site (typically the sampler), so we have no way of knowing who collected the samples. This information should be provided on future forms.

7. As near as I can tell I've been sent something like 4 versions of the "Updated" October Monthly Progress Report in the past 2 days. I suggest we ask Jack wait until he receives our comments and re-re-re-re-submit this report ONLY AFTER he has read and understood the comments and is prepared to send a final version that is acceptable to EPA. If Jack has questions or comments on what we want, I suggest we have a phone call to go over any issues, but re-submitting the same old stuff isn't getting anyone anywhere.

--

Robert T. Kay  
U.S. Geological Survey  
650G Peace Road  
DeKalb, IL 60115  
815-752-2041  
[rtkay@usgs.gov](mailto:rtkay@usgs.gov)